

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**IN RE TERRORIST ATTACK  
ON SEPTEMBER 11, 2001**

**KATHLEEN ASHTON**, as Administrator  
of the Estate of Thomas Ashton, Deceased  
and on behalf of all survivors of  
Thomas Ashton., et al.

**Plaintiffs**

v.

**AL QAEDA ISLAMIC ARMY**, et al.  
**Defendants**

**Case No.: 02 CV 6977 (RCC)  
02 CV 7209 (RCC)  
02 CV 7214 (RCC)  
03 MDL 1570**

**DEFENDANT INTERNATIONAL ISLAMIC RELIEF ORGANIZATION'S  
ANSWER TO THE SIXTH AMENDED COMPLAINT**

Defendant International Islamic Relief Organization ("IIRO"), through undersigned counsel, and pursuant to Rule 12, Fed. R. Civ. P., hereby submits its Answer to the Plaintiffs' Sixth Amended Complaint ("Complaint").

1. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 1.

**JURISDICTION AND VENUE**

2. IIRO denies that this court has subject matter jurisdiction over IIRO.
3. IIRO denies that venue is proper in this district.
4. IIRO denies that the allegations in paragraph 2 fall within the exceptions to jurisdictional immunity.

5. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 5.
6. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 6.
7. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 7.
8. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 8.
9. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 9.
10. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 10.
11. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 11.
12. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 12.
13. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 13.
14. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 14.
15. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 15.

16. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 16.

17. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 17.

18. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 18.

19. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 19.

20. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 20.

21. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 21.

22. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 22.

### **THE BIRTH OF AL QAEDA**

23. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 23.

24. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 24.

25. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 25.

26. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 26.

27. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 27.

28. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 28.

29. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 29.

30. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 30.

31. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 31.

32. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 32.

33. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 33.

34. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 34.

35. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 35.

#### **THE SUDAN**

36. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 36.

37. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 37.

38. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 38.

39. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 39.

40. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 40.

41. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 41.

42. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 42.

43. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 43.

44. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 44.

45. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 45.

46. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 46.

47. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 47.

48. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 48.

49. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 49.

50. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 50.

51. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 51.

52. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 52.

53. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 53.

54. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 54.

55. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 55.

56. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 56.

57. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 57.

58. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 58.

59. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 59.

60. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 60.

61. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 61.

62. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 62.

63. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 63.

64. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 64.

65. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 65.

66. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 66.

67. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 67.

68. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 68.

69. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 69.

70. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 70.

71. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 71.

72. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 72.

73. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 73.

74. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 74.

**The Agencies and Instrumentalities of the Republic of Sudan**

75. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 75.

76. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 76.

**IRAN**

77. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 77.

78. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 78.

79. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 79.

80. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 80.



81. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 81.

82. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 82.

83. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 83.

84. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 84.

85. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 85.

86. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 86.

87. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 87.

88. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 88.

89. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 89.

90. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 90.

91. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 91.

92. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 92.

93. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 93.

94. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 94.

95. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 95.

### **IRAQ**

96. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 96.

97. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 97.

98. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 98.

99. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 99.

100. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 100.

101. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 101.

102. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 102.

103. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 103.

104. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 104.

105. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 105.

106. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 106.

107. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 107.

108. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 108.

109. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 109.

**THE 1993 WTC BOMBING**

110. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 110.

111. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 111.

112. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 112.

113. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 113.

114. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 114.

115. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 115.

116. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 116.

117. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 117.

118. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 118.

### **SOMALIA**

119. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 119.

### **AL QAEDA during 1994-1996**

120. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 120.

121. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 121.

122. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 122.

**RETURN TO AFGHANISTAN**

123. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 123.

124. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 124.

**U.S. EMBASSY BOMBINGS**

125. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 125.

126. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 126.

127. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 127.

128. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 128.

129. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 129.

130. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 130.

131. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 131.

**THE 1998 U.S. AIR STRIKES ON AL QAEDA**

132. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 132.

133. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 133.

134. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 134.

135. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 135.

136. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 136.

**MILLENNIUM PLOT**

137. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 137.

**ATTACK ON U.S.S. COLE**

138. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 138.

139. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 139.

140. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 140.

141. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 141.

**PREPARATION FOR SEPTEMBER 11<sup>TH</sup> ATTACKS**

142. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 142.

143. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 143.

144. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 144.

145. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 145.

146. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 146.

147. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 147.

**SEPTEMBER 11<sup>TH</sup> ATTACKS**

148. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 148.

149. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 149.

150. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 150.

151. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 151.

152. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 152.

153. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 153.

**POST SEPTEMBER 11<sup>TH</sup>**

154. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 154.

155. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 155.

156. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 156.

157. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 157.

158. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 158.

**HAMBURG AL QAEDA CELL**

159. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 159.

160. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 160.

161. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 161.

162. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 162.

163. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 163.



164. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 164.

165. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 165.

166. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 166.

167. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 167.

168. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 168.

169. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 169.

170. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 170.

171. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 171.

172. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 172.

173. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 173.

174. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 174.

175. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 175.

176. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 176.

177. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 177.

178. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 178.

179. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 179.

180. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 180.

181. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 181.

182. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 182.

183. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 183.

184. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 184.

185. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 185.

186. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 186.

**SAUDI ARABIAN DEFENDANTS**

187. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 187.

188. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 188.

189. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 189.

190. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 190.

191. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 191.

192. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 192.

193. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 193.

194. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 194.

195. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 195.

196. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 196.

197. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 197.
198. IIRO denies the allegations of paragraph 198 insofar as they relate to IIRO.
199. IIRO denies the allegations of paragraph 199 insofar as they relate to IIRO.
200. IIRO denies the allegations of paragraph 200 insofar as they relate to IIRO.
201. IIRO denies the allegations of paragraph 201 insofar as they relate to IIRO.
202. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 202.
203. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 203.
204. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 204.
205. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 205.
206. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 206.
207. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 207.

208. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 208.

209. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 209.

210. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 210.

211. IIRO denies the allegations of paragraph 211 insofar as they relate to IIRO.

212. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 212.

213. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 213.

214. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 214.

215. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 215.

216. IIRO denies the allegations of paragraph 216 insofar as they relate to IIRO.

217. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 217.

**THE MUSLIM WORLD LEAGUE**

218. IIRO denies the allegations of paragraph 218 insofar as they relate to IIRO.

219. IIRO denies the allegations of paragraph 219 insofar as they relate to IIRO.

220. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 220.

221. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 221.

222. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 222.

223. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 223.

224. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 224.

225. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 225.

226. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 226.

**INTERNATIONAL ISLAMIC RELIEF ORGANIZATION**

227. IIRO denies the allegations of paragraph 227.

228. IIRO denies the allegations of paragraph 228.

229. IIRO denies the allegations of paragraph 229.

230. IIRO denies the allegations of paragraph 230.

231. IIRO denies the allegations of paragraph 231.

232. IIRO denies the allegations of paragraph 232.

233. IIRO denies the allegations of paragraph 233.

234. IIRO denies the allegations of paragraph 234.

235. IIRO denies the allegations of paragraph 235.

236. IIRO denies the allegations of paragraph 236.

237. IIRO denies the allegations of paragraph 237.

238. IIRO denies the allegations of paragraph 238.

239. IIRO denies the allegations of paragraph 239.

240. IIRO denies the allegations of paragraph 240.

241. IIRO denies the allegations of paragraph 241.

242. IIRO denies the allegations of paragraph 242.

243. IIRO denies the allegations of paragraph 243.

244. IIRO denies the allegations of paragraph 244.

245. IIRO denies the allegations of paragraph 245.

246. IIRO denies the allegations of paragraph 246.

247. IIRO denies the allegations of paragraph 247.

248. IIRO denies the allegations of paragraph 248.

249. IIRO denies the allegations of paragraph 249.

250. IIRO denies the allegations of paragraph 250.

**THE SAAR FOUNDATION**

251. IIRO denies the allegations of paragraph 250 insofar as they relate to IIRO.

252. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 252.

253. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 253.

254. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 254.

255. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 255.

256. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 256.

257. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 257.

258. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 258.

259. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 259.

260. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 260.

261. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 261.

262. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 262.

263. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 263.



264. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 264.

265. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 265.

266. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 265.

267. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 267.

268. IIRO denies the allegations of paragraph 268 insofar as they relate to IIRO.

269. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 269.

**THE GLOBAL RELIEF FOUNDATION**

270. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 270.

271. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 271.

272. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 272.

273. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 273.

274. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 274.

275. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 275.

276. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 276.

277. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 277.

278. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 278.

279. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 279.

280. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 280.

281. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 281.

282. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 282.

283. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 283.

**TAIBAH INTERNATIONAL AID ASSOCIATION**

284. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 284.

285. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 285.

286. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 286.

287. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 287.

288. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 288.

289. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 289.

290. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 290.

291. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 291.

292. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 292.

293. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 293.

294. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 294.

**BENEVOLENCE INTERNATIONAL FOUNDATION, INC. AND BATTERJEE**

295. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 295.

296. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 296.

297. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 297.

298. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 298.

299. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 299.

300. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 300.

301. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 301.

302. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 302.

303. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 303.

304. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 304.

305. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 305.

306. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 306.

307. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 307.

308. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 308.

309. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 309.

310. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 310.

311. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 311.

312. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 312.

313. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 313.

314. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 314.

315. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 315.

316. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 316.

317. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 317.

318. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 318.

319. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 319.

320. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 320.

321. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 321.

322. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 322.

323. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 323.

324. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 324.

325. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 325.

326. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 325.

327. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 327.

328. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 328.

**THE SAUDI HIGH COMMISSION**

329. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 329.

330. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 330.

331. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 331.

332. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 332.

333. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 333.

334. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 334.

335. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 335.

336. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 336.

337. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 337.

338. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 338.

339. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 339.

**MUWAFFAQ-BLESSED RELIEF; AL QADI AND BIN MAHFOUZ**

340. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 340.

341. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 341.

342. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 342.

343. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 343.

344. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 344.

345. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 345.

**AL-HARAMAIN**

346. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 346.

347. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 347.

348. IIRO denies the allegations of paragraph 348 insofar as they relate to IIRO.

349. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 349.

350. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 350.

351. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 351.



352. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 352.

353. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 353.

354. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 354.

355. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 355.

356. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 356.

357. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 357.

358. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 358.

359. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 359.

360. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 360.

361. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 361.

362. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 362.

363. IIRO denies the allegations of paragraph 363 insofar as they relate to IIRO.

364. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 364.

365. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 365.

366. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 366.

367. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 367.

368. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 368.

369. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 369.

370. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 370.

371. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 371.

372. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 372.

**RABITA TRUST**

373. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 373.

374. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 374.

375. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 375.

376. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 376.

377. IIRO denies the allegations of paragraph 377 insofar as they relate to IIRO.

378. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 378.

379. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 379.

380. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 380.

**AL RASHID TRUST**

381. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 381.

**THE MUSLIM BROTHERHOOD**

382. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 382.

383. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 383.

384. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 384.

385. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 385.

386. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 386.

387. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 387.

388. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 388.

389. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 389.

390. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 390.

391. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 391.

392. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 392.

**SAUDI BIN LADEN GROUP**

393. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 393.

394. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 394.

395. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 395.

396. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 396.

397. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 397.

398. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 398.

399. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 399.

400. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 400.

401. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 401.

402. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 402.

403. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 403.

404. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 404.

405. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 405.

406. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 406.

407. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 407.

408. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 408.

409. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 409.

410. IIRO denies the allegations of paragraph 410 insofar as they relate to IIRO.

411. IIRO denies the allegations of paragraph 411 insofar as they relate to IIRO.

412. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 412.

**AL-RAJHI BANK**

413. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 413.

414. IIRO denies the allegations of paragraph 414 insofar as they relate to IIRO.

415. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 415.

416. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 416.

417. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 417.

418. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 418.

419. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 419.

420. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 420.

421. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 421.

422. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 422.

**NATIONAL COMMERCIAL BANK AND BIN MAHFOUZ**

423. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 423.

424. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 424.

425. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 425.

426. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 426.

427. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 427.

428. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 428.

429. IIRO denies the allegations of paragraph 429 insofar as they relate to IIRO.

430. IIRO denies the allegations of paragraph 430 insofar as they relate to IIRO.

431. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 431.

432. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 432.

433. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 433.

434. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 434.

**DAR AL MAAL AL ISLAMI**

435. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 435.

436. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 436.

437. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 437.

438. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 438.



439. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 439.

440. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 440.

441. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 441.

442. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 442.

443. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 443.

444. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 444.

**AL BARAKA INVESTMENT AND DEVELOPMENT CORP.**

445. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 445.

446. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 446.

447. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 447.

448. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 448.

449. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 449.

450. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 450.

451. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 451.

452. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 452.

453. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 453.

454. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 454.

455. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 455.

456. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 456.

457. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 457.

458. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 458.

459. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 459.

460. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 460.

461. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 461.

462. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 462.

### **COUNT ONE**

#### **WRONGFUL DEATH BASED ON INTENTIONAL MURDER**

463. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

464. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

465. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

466. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

467. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

**COUNT TWO**

**SURVIVAL DAMAGES BASED ON INTENTIONAL MURDER**

468. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

469. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

470. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

471. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

**COUNT THREE**

**ASSAULT AND BATTERY**

472. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

473. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

474. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

475. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

#### **COUNT FOUR**

##### **VIOLATION OF ANTI-TERRORISM ACT, 18 U.S.C. § 2333**

476. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

477. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

478. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

479. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

**COUNT FIVE**

**TORTURE VICTIM PROTECTION ACT**

480. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

481. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

482. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

483. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

**COUNT SIX**

**ANTI TERRORISM AND EFFECTIVE DEATH PENALTY ACT CLAIM,  
28 U.S.C. § 1605(A)(7) -- IRAQ, IRAN AND THE SUDAN**

484. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

485. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

486. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

487. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

488. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

489. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

490. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

#### **COUNT SEVEN**

#### **PUNITIVE DAMAGES**

491. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

492. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

**COUNT EIGHT**

**PROPERTY DAMAGE**

493. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

494. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

495. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

**FIRST AFFIRMATIVE DEFENSE**

(Failure to State a Claim)

Plaintiffs' claims fail to state a claim against IIRO for which relief may be granted.

**SECOND AFFIRMATIVE DEFENSE**

(Causation)

There is no causal connection between any of IIRO's activities and plaintiffs' injuries.

**THIRD AFFIRMATIVE DEFENSE**

(Causation)

No act or omission of any agent, servant, or employee of IIRO proximately caused any harm or damages to plaintiffs.



**FOURTH AFFIRMATIVE DEFENSE**

(Other Tortfeasors)

Plaintiffs' damages and injuries were caused by other individuals or entities who are, or are not, named as parties to this action.

**FIFTH AFFIRMATIVE DEFENSE**

(Improper Venue)

This Court is not the proper venue for plaintiffs' claims against IIRO.

**SIXTH AFFIRMATIVE DEFENSE**

(Subject Matter Jurisdiction)

This Court does not have subject matter jurisdiction over plaintiffs' claims against IIRO.

**SEVENTH AFFIRMATIVE DEFENSE**

The Central Intelligence Agency, The Federal Bureau of Investigation, and other agencies of the United States government had information and resources to prevent the September 11, 2001, attacks from occurring. But for their failure to utilize this information and these resources, MWL would not be a named defendant in this action.

**EIGHTH AFFIRMATIVE DEFENSE**

(Personal Jurisdiction)

This Court does not have personal jurisdiction over plaintiffs' claims against IIRO.

**NINTH AFFIRMATIVE DEFENSE**

(Estoppel)

Plaintiffs are estopped from receiving the relief requested against IIRO.

**TENTH AFFIRMATIVE DEFENSE**

(Statute of Limitations)

Plaintiffs' claims against IIRO are barred, in whole or in part, by the applicable statute of limitations.

**ELEVENTH AFFIRMATIVE DEFENSE**

(Punitive Damages)

Plaintiffs' claims for punitive damages against IIRO are barred because IIRO's activities, as alleged by plaintiffs, were not committed with intent, malice, willful and outrageous conduct aggravated by evil motive, or reckless indifference, and none of IIRO's activities in any way were intended to, or did harm, the plaintiffs in this action.

**TWELFTH AFFIRMATIVE DEFENSE**

(No Double Recovery)

Plaintiffs' claims for compensatory and punitive damages are barred to the extent that some plaintiffs are also seeking recovery against IIRO, for the same or similar claims, in the civil actions comprising the multi-district entitled *In re Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (RCC), pending in the United States District Court for the Southern District of New York.

**THIRTEENTH AFFIRMATIVE DEFENSE**

(Immunity)

IIRO is an instrumentality of the government of the Kingdom of Saudi Arabia. Accordingly, IIRO is immune from suit.

**FOURTEENTH AFFIRMATIVE DEFENSE**

In response to plaintiffs' claims, IIRO intends to invoke any other defenses, including, affirmative defenses, as they may become apparent through discovery, and reserve the right, in accordance with the Federal Rules of Civil Procedure and the Local Civil Rules of the United States District Court for the Southern District of New York, to assert such defenses.

WHEREFORE, IIRO requests that the Plaintiffs' Sixth Amended Complaint be dismissed with prejudice as to IIRO, and the Court award attorney's fees and costs to IIRO in defending this case with no factual or legal basis against IIRO, and award any other relief that the Court deems just under the circumstances.

Respectfully submitted,

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Martin F. McMahon  
Bar No. 196642  
Martin McMahon & Associates  
1150 Connecticut Ave., N.W.  
Ste. 900  
Washington, D.C. 20036  
(202) 862-4343